

REMARKS

Applicants respectfully request reconsideration of this application as amended.

By this amendment, the outstanding §101 rejections have been addressed. It is therefore believed the rejected claims are in full compliance with §101.

With respect to the art-based rejections, the Office Action relies upon the teachings of Lubin in combination with Hou.

As previously discussed, Lubin fails to teach, suggest or disclose using a two-dimensional wavelet transform - the Office Action agrees, but asserts that Lubin teaches using “transform coefficients.” (See pg. 5) The Office Action relies upon Hou for teaching “transformed data is referred to as coefficients.”

Applicants respectfully submit, that upon reading the Hou, Hou does not teach, suggest or disclose wavelet transforms.

In distinct contrast, Hou uses modulated lapped transforms (MLT), which is actually an extension of a discrete cosine transform (DCT). The relied upon section of Hou (column 23, lines 29-35) is saying that the MLT *performs similar* to the wavelet transform (retains more higher frequency details), however, Hou *does not state* that the MLT is similar to the wavelet transform.

Specifically, in column 3, line 53, Hou defines the MLT as:

The Modulated Lapped Transform (MLT) is a hybrid transform. The desirable property of the MLT is the advantageous high speed of the DCT and the reduced blocking artifacts of wavelet transform. The MLT employs a scan, which may be for example, a raster scan or a peano scan for inputting data into the MLT. The MLT uses a subband filter bank and the window used in MLT spans two DCT blocks, but the window shifts block-by-block. Thus, the MLT performs not only a fast DCT but also a blockwise convolution for reduce blocking artifacts. The use of overlapped windows in MLT obviates many of the blocking artifacts occurring at low-bit rates for the DCT compression method.

It is abundantly clear that the MLT *is not* a wavelet transform. Therefore, the combination of Lubin and Hou does not teach, suggest or disclose the claimed invention.

The dependent claims are further distinguishable from the cited references at least based on the above and the additional feature(s) recited therein.

Will all claims being patentably distinguishable from the references of record, the application is in condition for allowance. A notice of allowance is thus respectfully requested.

The Commissioner is hereby authorized to charge to deposit account number 19-1970 any fees under 37 CFR § 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby petitioned.

Respectfully submitted,

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